

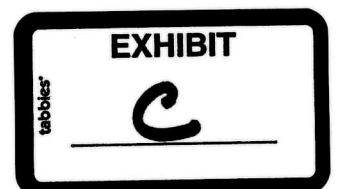
IN THE UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

GREGORY THOMAS BERRY, <u>et al.</u> ,	:	CASE NO. 3:11CV754
Plaintiffs,	:	(Judge James R. Spencer)
v.	:	(Magistrate Judge M. Hannah Lauck)
LEXISNEXIS RISK & INFORMATION	:	VIDEO TRANSCRIPTIONS AND
ANALYTICS GROUP, INC., <u>et al.</u> ,	:	AFFIDAVIT OF VICKI JOYCE
Defendants.	:	AFFIRMING TRUTHFULNESS
		<u>AND ACCURACY OF VIDEO</u>
		<u>TRANSCRIPTIONS</u>

I, Vicki Joyce, certify that I viewed two videos in which Watts Guerra, L.L.P. attorney Ryan Thompson discussed the Berry, et al. v. LexisNexis Risk & Information Analytics Group, Inc., et al., Settlement Agreement. I affirm that the following is a true and accurate transcription of the audio of those videos.

VIDEO ONE

Hi, I'm Ryan Thompson and I'm a partner with the Watts Guerra law firm in San Antonio, Texas. It was our privilege to represent you in the Trans Union litigation. It was a long and hard fight but ultimately we won. Now we're concerned about a Georgia company called LexisNexis. LexisNexis is accused of misusing consumer reports in connection with approximately 100 million Americans and you may be one of those 100 million Americans. Misuse of consumer reports is a violation of federal law. That federal law is known as the Fair Credit Reporting Act. It's a serious matter. It's our contention that LexisNexis violated the Fair Credit Reporting Act and you are entitled to damages if you prove a violation from \$100 to \$1,000. So if you are over



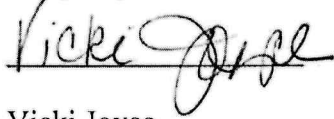
the age of 18, you are more likely than not one of the 100 million Americans who are included and whose rights could be affected if this class action is approved by the Judge. A class action lawsuit was filed against LexisNexis in 2008 in federal court in Virginia. Since that time the parties have negotiated a settlement and that settlement is now pending before the Judge for acceptance. If you don't assert your rights and object to the class action settlement, the Judge will in all likelihood approve that settlement and your rights under that class action will be forever erased. You would give up your right to statutory damages in the amount of \$100 to \$1,000 for violations of that act; they need to be held accountable. That's what we're here to do today. If you want us to object on your behalf to the proposed class settlement in Virginia, we'll do it. The deadline to object is rapidly approaching and just as we did in the Trans Union litigation, we'd be happy to represent you in this case on a pure contingent fee basis. We don't get paid until you get paid and we will advance all costs and expenses out of our pocket, not yours. You risk nothing by being a part of this action. The process to sign up with our law firm is simple, it's secure and it's very quick. If you click on the link at the bottom of this page, it'll take you to a short questionnaire, it's about a page long. Additionally we'll need you to sign off on a short contingency fee contract that allows us permission to go work on your behalf. Ultimately if we're able to successfully object on your behalf and then bring a claim against LexisNexis and prove violations of the Fair Credit Reporting Act, we'll send you a check in the mail. See if you qualify to object to the class action and to make a claim. Sign up today..

VIDEO TWO

Hi I'm Ryan Thompson and I'm a partner with the Watts Guerra law firm in San Antonio, Texas. If you're one of the more than 100 million Americans who are over the age of 18 and have ever applied for any kind of a loan, a credit card, or even applied for a driver's license or registered to vote, you are more likely than not one of the 100 million Americans who could be entitled to statutory damages of \$100 to \$1000 for each proven willful violation of the Fair Credit Reporting Act. Our federal law in the United States guarantees you a right to privacy and regulates the use of your private credit report. That federal law is known as the Fair Credit Reporting Act and it's a serious matter. We believe a large Georgia company called LexisNexis may be misusing consumer reports potentially even consumer reports about you. It's our contention that LexisNexis may have compiled your private credit information and then sold that information for a profit without following the very specific requirements set forth under the Fair Credit Reporting Act, your personal information, your consumer report is important. It determines whether or not you get credit in this country, whether you can go buy a car, you can buy a home or get furniture to put in your apartment. When a company like LexisNexis breaches that trust of your consumer information, your private and personal information, they must be held accountable and that's what we're here to do today. We believe you have a right to be paid for damages in the amount of \$100 to \$1,000 for each violation of the Fair Credit Reporting Act. We represent more than 20,000 Americans just like yourself against LexisNexis. We'd like to represent you too and I'll do it on a pure contingency fee basis, that means I don't get paid unless you get paid and if you don't get paid and we don't obtain a recovery on your behalf, you owe us nothing. We will take on the task of proving your claim for you. Then as we move along we'll send you emails periodically to keep you updated on the process. Shouldn't take much of your

time at all, sign up today, go to the bottom of the page, click on the link that allows you to sign up, complete the short questionnaire. It's simple, it's easy, it's just a few questions. Additionally you'll need to sign a short contingency fee contract that gives us the authority to go to work on your behalf. Again you risk nothing. Sign up today, see if you qualify, see if we can help represent you.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read "Vicki Joyce", written over a horizontal line.

Vicki Joyce
Executed on October 21, 2013.